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Attorneys for the Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING**

THE ESTATE OF JACK C. LUNNEEN, deceased,
by Thomas E. Lunneen, personal representative,

Plaintiff,

v.

BERRIEN SPRINGS, VILLAGE OF, et al.

Defendants.

Case No. 20-CV-1007

Hon. Hala Y. Jarbou

PLAINTIFF'S SUPPLEMENTAL EXPERT WITNESS DISCLOSURE

In accordance with Fed. R. Civ. P. 26(e)(2), Plaintiff hereby supplements his designation of expert Jeffrey J. Noble and provides a supplement to Mr. Noble's report based on information and evidence made available to Plaintiff after Mr. Noble was designated and his initial report was disclosed. Mr. Noble's supplemental findings and opinions are set forth in the attached Exhibit 1.

Mr. Noble will testify to the facts and opinions contained in this supplemental report, along with his previously disclosed expert report, and to any opinions discussed during any forthcoming deposition. A copy of his CV, list of testimony and fee schedule were previously disclosed with on January 18, 2022 with *Plaintiff's Expert Witness Disclosure* (ECF No. 57). Mr. Noble's opinions are based on his education, experience, training, and review of the case materials provided to date. All opinions contained therein are to a reasonable degree of probability. This supplemental disclosure is timely as the depositions of Defendants' 30(b)(6) designates were taken on April 13, 2022, and Plaintiff received a copy of the transcripts of those depositions in the late evening on April 29, 2022.

RESPECTFULLY SUBMITTED this 10th day of May 2022.

/s/Noah W. Drew

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